

JAP:MPR

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

14-1083 M

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a) and 960)

ORAL CAINES,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

DAVID SCHRADER, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about December 17, 2014, within the Eastern District of New York and elsewhere, the defendant ORAL CAINES, did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and belief are as follows:<sup>1</sup>

1. On or about December 17, 2014, the defendant ORAL CAINES arrived at John F. Kennedy International Airport in Queens, New York, aboard Caribbean Airlines Flight No. BW 524 from Georgetown, Guyana.

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<sup>1</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. Defendant ORAL CAINES was selected for a Customs and Border Protection (“CBP”) examination. The defendant was in possession of three bags, including two checked-in suitcases and one carry-on duffle bag. During standard CBP examination questions, the defendant ORAL CAINES claimed ownership of the three bags and their contents. During the examination of the bags, a CBP officer opened a red curry container found in the defendant’s luggage. Inside the container, under a layer of curry, a CBP officer located a plastic bag. The defendant was then escorted to a private examination area for further inspection of his luggage.

3. During that examination, six red plastic containers of curry and two clear plastic containers of rice were located. Each container was found to have packages concealed inside. A CBP officer probed a package recovered from one of the red curry containers, which revealed a white powdery substance. The substance field tested positive for the presence of cocaine. The defendant ORAL CAINES was placed under arrest.

4. Following his arrest, the defendant was advised of his Miranda rights, which he agreed to waive. The defendant then stated, in sum and substance and in part, that he knew his luggage contained drugs and that he was paid \$5,000 to bring the drugs into the United States.

5. The total approximate gross weight of the cocaine recovered from the defendant’s luggage was 19.2336 kilograms.

WHEREFORE, your deponent respectfully requests that the defendant ORAL CAINES be dealt with according to law.

Dated: Brooklyn, New York  
December 18, 2014

S/ David Caines

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DAVID SCHRADER  
Special Agent  
Homeland Security Investigations

Sworn to before me on  
the 18 day of December, 2014

S/ Roanne Mann

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THE HONORABLE ROANNE L. MANN  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK